

# Statement of Basis of the Federal Operating Permit

OXEA Bishop, LLC

Site/Area Name: Bishop Plant  
Physical location: 5738 County Road 4  
Nearest City: Bishop  
County: Nueces

Permit Number: O2009  
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869  
SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: September 23, 2014

## Operating Permit Basis of Determination

### Permit Area Process Description

**POLYOL UNITS:** These units consist of four manufacturing processes: Trimethylolpropane (TMP), Pentaerythritol (PE), 1,3-Butylene Glycol (1,3-BG), and Sodium Formate Recovery Unit (SFRU). The Trimethylolpropane Unit produces TMP by reacting formaldehyde, butyraldehyde, and sodium hydroxide together. The production of TMP goes through three units: reaction area, extraction area, and finishing area. Molten liquid TMP is stored in a bulk storage tank or flaked as a solid for shipment to customers. In the Pentaerythritol Unit, formaldehyde, acetaldehyde, and sodium hydroxide are mixed together to cause a reaction to produce several grades of PE and Sodium Formate. The product solution is forwarded to a separation process. The PE solution is then crystallized, purified, and re-crystallized before the product is dried and sent to the packaging area for storage in the Polyol Warehouse. In the BG unit, Acetaldol is formed through reaction of Acetaldehyde with Sodium Hydroxide. Acetaldol is then reacted with Pyrophoric Catalyst and high pressure Hydrogen to produce BG. BG is stored in a bulk storage tank for shipment to customers. The Sodium Formate Recovery Unit (SFRU) is classified as a Non-Hazardous Unit. The unit processes AML, a Pentaerythritol (PE) byproduct, through an evaporation and a crystallization process whereby Sodium Formate is crystallized, centrifuged, dried, and conveyed for storage and transportation. Centrate, a waste product of the SFRU process, is blended with other sodium salt waste streams from the plant and sold as Pentaform Plus or Centrate.

### FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, HAPS
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### Reading State of Texas’ Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- Additional Monitoring Requirements
- New Source Review Authorization Requirements
- Compliance Requirements
- Protection of Stratosphere Ozone
- Permit Location
- Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,”

detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

**Additional Monitoring Requirement.** The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	No
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

## **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

## **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.

23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.



## Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
126V883	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Other control device</p>
126V883	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
126V892	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
126V892	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
126V900	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
126V900	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
129V1274	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Tank Description = Tank using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
129V161	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
129V1684	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
129V2474	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
129V2548	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
129V2612	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>

Unit ID	Regulation	Index Number	Basis of Determination*
129V2977	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
129V2977	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
129V3075	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
129V3076	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
129V747	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
129V747	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>
129V755	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
129V762	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
130V-304	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
130V-304	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
GRP-TANKS1	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Control Device Type = Other control device
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Other control device</p>
GRP-TANKS2	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Boiler or process heater with a design heat input capacity greater than or equal to 44 MW</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p>
GRP-TANKS3	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Other control device</p>
GRP-TANKS4	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
GRP-TANKS4	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TANKS5	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
GRP-TANKS7	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
GRP-TANKS8	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
GRP-TANKS8	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
129UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p>
129UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R115-2	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
130ACHRAIL	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only unloading. True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.
GRP-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is less than 1.5 psia.
129FUG	40 CFR Part 60, Subpart VV	60VV-1	PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 40 CFR 60.489 AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) 40 CFR 60 (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = ON/BEFORE JANUARY 5, 1981
129FUG	40 CFR Part 61, Subpart V	61V-1	ALT MEANS OF EMISSION LIMITATION (AMEL)--OTHER CLOSED VENT SYSTEMS [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NESHAP V] = NO COMPONENT IN VACUUM SERVICE [NESHAP V] = NO COMPRESSORS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO PRESSURE RELIEF DEVICES (PRD) IN VHAP GAS/VAPOR SERVICE [NESHAP V] = NO PRODUCT ACCUMULATOR VESSELS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO SAMPLING CONNECTION SYSTEMS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO VALVES IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO ALT MEAN EMISSION LIMIT (AMEL)-CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO ALT MEANS EMISSION LIMIT (AMEL)-CLOSED VENT SYSTEM W/ VAPOR RECOVERY [NESHAP V] = NO ALT MEANS EMISSION LIMIT (AMEL)-PRODUCT ACCUMULATOR VESSEL VHAP SVC [NESHAP V] = NO ALT MEANS EMISSION LIMITATION (AMEL)-SAMPLING CONNECTION SYS VHAP SVC [NESHAP V] = NO ALT MEANS OF EMISSION LIMITATION (AMEL)-CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD GAS/VAPOR VHAP SVC [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--COMPRESSORS VHAP SVC [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--VALVES VHAP SERVICE [NESHAP V] = NO COMPONENT IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO PUMPS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--PUMPS VHAP SERVICE [NESHAP V] = NO

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>FLANGES &amp; OTHER CONNECTORS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>OPEN-ENDED VALVES OR LINES VOLATILE HAZARDOUS AIR POLLUTANT SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP LIQUID SERVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-FLANGES/OTHER CONNECTORS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD LIQUID VHAP SVC [NESHAP V] = NO</p>
129FUG	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p>



Unit ID	Regulation	Index Number	Basis of Determination*
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
13oFUG	4o CFR Part 6o, Subpart VV	6oVV-1	PRODUCES CHEMICALS LISTED IN 4o CFR 6o.489 = DOES NOT PRODUCE ANY CHEMICAL LISTED IN 4o CFR 6o.489 AS INTERMEDIATE OR FINAL PRODUCT AFFECTED FACILITY AS DEFINED IN 4o CFR 6o.48o(A)(2) = FACILITY IS NOT AN AFFECTED FACILITY AS DEFINED IN 4o CFR 6o.48o(A)(2) 4o CFR 6o (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = ON/BEFORE JANUARY 5, 1981
13oFUG	4o CFR Part 61, Subpart V	61V-1	ALT MEANS OF EMISSION LIMITATION (AMEL)--OTHER CLOSED VENT SYSTEMS [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NESHAP V] = NO CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NESHAP V] = NO COMPONENT IN VACUUM SERVICE [NESHAP V] = NO COMPRESSORS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO PRESSURE RELIEF DEVICES (PRD) IN VHAP GAS/VAPOR SERVICE [NESHAP V] = NO PRODUCT ACCUMULATOR VESSELS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO SAMPLING CONNECTION SYSTEMS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO VALVES IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO ALT MEAN EMISSION LIMIT (AMEL)-CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO ALT MEANS EMISSION LIMIT (AMEL)-CLOSED VENT SYSTEM W/ VAPOR RECOVERY [NESHAP V] = NO ALT MEANS EMISSION LIMIT (AMEL)-PRODUCT ACCUMULATOR VESSEL VHAP SVC [NESHAP V] = NO ALT MEANS EMISSION LIMITATION (AMEL)-SAMPLING CONNECTION SYS VHAP SVC [NESHAP V] = NO ALT MEANS OF EMISSION LIMITATION (AMEL)-CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD GAS/VAPOR VHAP SVC [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--COMPRESSORS VHAP SVC [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--VALVES VHAP SERVICE [NESHAP V] = NO COMPONENT IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO PUMPS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--PUMPS VHAP SERVICE [NESHAP V] = NO FLANGES & OTHER CONNECTORS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO OPEN-ENDED VALVES OR LINES VOLATILE HAZARDOUS AIR POLLUTANT SERVICE [NESHAP V] = NO PRESSURE RELIEF DEVICES (PRD) IN VHAP LIQUID SERVICE [NESHAP V] = NO ALT MEANS EMISSION LIMIT (AMEL)-FLANGES/OTHER CONNECTORS VHAP SVC [NESHAP V] = NO ALT MEANS EMISSION LIMITATION (AMEL)-OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD LIQUID VHAP SVC [NESHAP V] = NO

Unit ID	Regulation	Index Number	Basis of Determination*
130FUG	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT DOES NOT CONTAIN EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE = ENCLOSED VENTED PROCESS UNIT DOES NOT CONTAIN EQUIPEMENT IN HEAVY LIQUID SERVICE</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS ONLY PROCESSES FOR RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.178</p> <p>DIFFICULT TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>
13oFUGACH	4o CFR Part 6o, Subpart VV	6oVV-1	<p>PRODUCES CHEMICALS LISTED IN 4o CFR 6o.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 4o CFR 6o.489</p> <p>AFFECTED FACILITY AS DEFINED IN 4o CFR 6o.48o(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 4o CFR 6o.48o(A)(2)</p> <p>4o CFR 6o (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = ON/BEFORE JANUARY 5, 1981</p>
13oFUGACH	4o CFR Part 61, Subpart V	61V-1	<p>ALT MEANS OF EMISSION LIMITATION (AMEL)--OTHER CLOSED VENT SYSTEMS [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NESHAP V] = NO</p> <p>COMPONENT IN VACUUM SERVICE [NESHAP V] = NO</p> <p>COMPRESSORS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP GAS/VAPOR SERVICE [NESHAP V] = NO</p> <p>PRODUCT ACCUMULATOR VESSELS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>SAMPLING CONNECTION SYSTEMS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>VALVES IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>ALT MEAN EMISSION LIMIT (AMEL)-CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-CLOSED VENT SYSTEM W/ VAPOR RECOVERY [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-PRODUCT ACCUMULATOR VESSEL VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-SAMPLING CONNECTION SYS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS OF EMISSION LIMITATION (AMEL)-CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD GAS/VAPOR VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--COMPRESSORS VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--VALVES VHAP SERVICE [NESHAP V] = NO</p> <p>COMPONENT IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>PUMPS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--PUMPS VHAP SERVICE [NESHAP V] = NO</p> <p>FLANGES &amp; OTHER CONNECTORS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>OPEN-ENDED VALVES OR LINES VOLATILE HAZARDOUS AIR POLLUTANT SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP LIQUID SERVICE [NESHAP V] = NO</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>ALT MEANS EMISSION LIMIT (AMEL)-FLANGES/OTHER CONNECTORS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD LIQUID VHAP SVC [NESHAP V] = NO</p>
130FUGACH	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>
GRP-FUGS	40 CFR Part 60, Subpart VV	60VV-1	<p>CLOSED VENT (OR VAPOR COLLECTION) SYSTEM [NSPS VV] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NSPS VV] = NO CLOSED VENT SYSTEM WITH ENCLOSED COMBUSTION DEVICE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NSPS VV] = NO CLOSED VENT SYSTEM WITH FLARE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NSPS VV] = NO CLOSED VENT SYSTEM WITH VAPOR RECOVERY SYSTEM AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPRESSORS (ANY SERVICE) [NSPS VV] = NO COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>EQUIPMENT IN VACUUM SERVICE [NSPS VV] = NO EQUIPMENT IN VACUUM SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 40 CFR 60.489</p> <p>VALVES HEAVY LIQUID SERVICE [NSPS VV] = NO VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2)</p> <p>EQUIVALENT EMISSION LIMITATION (EEL) UNDER 40 CFR 60.482-1(C) = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--CVS/ENCLOSED COMBUSTION DEVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--CVS/FLARE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--CVS/VAPOR RECOVERY SYSTEM [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>PUMPS IN LIGHT LIQUID SERVICE [NSPS VV] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>40 CFR 60 (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = ON/BEFORE JANUARY 5, 1981</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ FLARE [NSPS VV] = NOT COMPLYING WITH 40 CFR 60.482-10</p> <p>COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ VAPOR RECOVERY SYS [NSPS VV] = NOT COMPLYING WITH 40 CFR 60.482-10</p> <p>COMPLYING W/ 40 CFR 60.482-10--CVS W/ ENCLOSED COMBUSTION DEVICE [NSPS VV] = NOT COMPLYING WITH 40 CFR 60.482-10</p> <p>COMPLYING WITH 60.482-10 (NSPS VV) = NO</p> <p>COMPLYING W/ 40 CFR 60.482-2--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-2</p> <p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS VV] = NO FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES GAS/VAPOR SERVICE [NSPS VV] = NO PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS VV] = NO SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = NO VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES/CONNECTORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--VALVES GAS/VAPOR, LIGHT LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS VV] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS HEAVY LIQUID SERVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>COMPLYING W/ 40 CFR 60.482-7--VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-7</p> <p>COMPLYING W/ 40 CFR 60.482-8--FLANGES AND OTHER CONNECTORS [NSPS VV] = NOT COMPLYING WITH 40 CFR 60.482-8</p>
GRP-FUGS	40 CFR Part 61, Subpart V	61V-1	<p>ALT MEANS OF EMISSION LIMITATION (AMEL)--OTHER CLOSED VENT SYSTEMS [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NESHAP V] = NO</p> <p>COMPONENT IN VACUUM SERVICE [NESHAP V] = NO</p> <p>COMPRESSORS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP GAS/VAPOR SERVICE [NESHAP V] = NO</p> <p>PRODUCT ACCUMULATOR VESSELS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>SAMPLING CONNECTION SYSTEMS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>VALVES IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>ALT MEAN EMISSION LIMIT (AMEL)-CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-CLOSED VENT SYSTEM W/ VAPOR RECOVERY [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-PRODUCT ACCUMULATOR VESSEL VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-SAMPLING CONNECTION SYS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS OF EMISSION LIMITATION (AMEL)-CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD GAS/VAPOR VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--COMPRESSORS VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--VALVES VHAP SERVICE [NESHAP V] = NO</p> <p>COMPONENT IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>PUMPS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--PUMPS VHAP SERVICE [NESHAP V] = NO</p> <p>FLANGES &amp; OTHER CONNECTORS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>OPEN-ENDED VALVES OR LINES VOLATILE HAZARDOUS AIR POLLUTANT SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP LIQUID SERVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-FLANGES/OTHER CONNECTORS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD LIQUID VHAP SVC [NESHAP V] = NO</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-FUGS	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
130CT110	40 CFR Part 63, Subpart Q	63Q-1	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106A	40 CFR Part 63, Subpart Q	63Q-1	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106B	40 CFR Part 63, Subpart Q	63Q-1	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106C	40 CFR Part 63, Subpart Q	63Q-1	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C and above).</p>
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	R115-2	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C and above).</p>
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	R115-3	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C and above).</p>
GRP-DISTILL1	40 CFR Part 60, Subpart NNN	60NNN-1	<p>40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = ON/BEFORE DECEMBER 30, 1983</p>
GRP-DISTILL2	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT DOES NOT PRODUCE ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE
130HE-1708	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE



Unit ID	Regulation	Index Number	Basis of Determination*
			CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
130HE-2606	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
130T-203	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
130T-271	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
130V-1296	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
130V-2615	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE CONSTRUCTION/MODIFICATION DATE = ON/BEFORE JUNE 29, 1990
GRP-REACTORS	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE
GRP-PROCESS	40 CFR Part 63, Subpart F	63F-1	Applicable Chemicals = THE CHEMICAL MANUFACTURING PROCESS UNIT MANUFACTURES, AS A PRIMARY PRODUCT, ONE OR MORE OF THE CHEMICALS LISTED IN 40 CFR § 63.100(B)(1)(I) OR 40 CFR § 63.100(B)(1)(II) Table 2 HAP = THE CHEMICAL MANUFACTURING PROCESS UNIT USES AS A REACTANT OR MANUFACTURES, AS A PRODUCT OR CO-PRODUCT, ONE OR MORE OF THE ORGANIC HAZARDOUS AIR POLLUTANTS (HAPS) IN TABLE 2 Alternate Means of Emission Limitation = AN ALTERNATIVE MEANS OF EMISSION LIMITATION IS NOT USED TO ACHIEVE A REDUCTION IN ORGANIC HAP EMISSION Heat Exchange System = A HEAT EXCHANGE SYSTEM IS NOT USED Cooling Water Pressure = THE HEAT EXCHANGE SYSTEM IS NOT OPERATED WITH THE MINIMUM PRESSURE ON THE COOLING WATER SIDE AT LEAST 35 KILOPASCALS GREATER THAN THE MAXIMUM PRESSURE ON THE PROCESS SIDE
PROTMP	40 CFR Part 63, Subpart F	63F-1	Applicable Chemicals = THE CHEMICAL MANUFACTURING PROCESS UNIT MANUFACTURES, AS A PRIMARY PRODUCT, ONE OR MORE OF THE CHEMICALS LISTED IN 40 CFR § 63.100(B)(1)(I) OR 40 CFR § 63.100(B)(1)(II) Intervening Cooling Fluid = THERE IS NOT AN INTERVENING COOLING FLUID (CONTAINING LESS THAN 5 PERCENT BY WEIGHT OF TOTAL HAPS LISTED IN TABLE 4 OF 40 CFR PART 63, SUBPART F) BETWEEN THE PROCESS AND COOLING WATER Table 2 HAP = THE CHEMICAL MANUFACTURING PROCESS UNIT USES AS A REACTANT OR MANUFACTURES, AS A PRODUCT OR CO-PRODUCT, ONE OR MORE OF THE ORGANIC HAZARDOUS AIR POLLUTANTS (HAPS) IN TABLE 2 Table 4 HAP Content = THE RECIRCULATING HEAT EXCHANGE SYSTEM IS USED TO COOL PROCESS FLUIDS THAT CONTAIN LESS THAN 5 PERCENT BY WEIGHT OF TOTAL HAPS LISTED IN TABLE 4 OF TITLE 40 CFR PART 63, SUBPART F Alternate Means of Emission Limitation = AN ALTERNATIVE MEANS OF EMISSION LIMITATION IS NOT USED TO ACHIEVE A REDUCTION IN ORGANIC HAP EMISSION NPDES Permit = HEAT EXCHANGE SYSTEM IS NOT SUBJECT TO A NPDES PERMIT WITH ALLOWABLE DISCHARGE LIMIT Meets 40 CFR 63.104(a)(4)(i)-(iv) = HEAT EXCHANGER NOT REQUIRED TO MEET THIS CITATION Heat Exchange System = A HEAT EXCHANGE SYSTEM IS NOT USED

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Table 9 HAP Content = ONCE-THROUGH HEAT EXCHANGE SYSTEM IS USED TO COOL PROCESS FLUIDS THAT CONTAIN LESS THAN 5 PERCENT BY WEIGHT OF TOTAL HAPS LISTED IN TABLE 9 OF 40 CFR PART 63, SUBPART G</p> <p>Cooling Water Monitored = COOLING WATER IS BEING MONITORED FOR THE PRESENCE OF ONE OR MORE HAPS OR OTHER REPRESENTATIVE SUBSTANCES WHOSE PRESENCE IN COOLING WATER INDICATES A LEAK</p> <p>Cooling Water Pressure = THE HEAT EXCHANGE SYSTEM IS NOT OPERATED WITH THE MINIMUM PRESSURE ON THE COOLING WATER SIDE AT LEAST 35 KILOPASCALS GREATER THAN THE MAXIMUM PRESSURE ON THE PROCESS SIDE</p>

\* - The “unit attributes” or operating conditions that determine what requirements apply

## NSR versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Outdated Standard Exemption lists may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 19340	Issuance Date: 08/10/2006
Authorization No.: 24875	Issuance Date: 06/16/2014
Authorization No.: 29966	Issuance Date: 10/27/2006
Authorization No.: 83848	Issuance Date: 05/24/2010
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.475	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000

## Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

### **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

#### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 126V883	
Control Device ID No.: 310 B12	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

Unit/Group/Process Information	
ID No.: 126V883	
Control Device ID No.: MS FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of a pilot flame shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 126V883	
Control Device ID No.: MO3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.



Unit/Group/Process Information	
ID No.: 129V1274	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any defects detected shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: 129V755	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation if the repairs are not completed prior to refilling the storage vessel.	
<p>Basis of monitoring:</p> <p>The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources.</p>	

Unit/Group/Process Information	
ID No.: 129V755	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Liquid Level	
Minimum Frequency: At the end of each unloading operation	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation anytime the liquid volume falls below the liquid volume at the fill pipe.	
<p>Basis of monitoring:</p> <p>The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources.</p>	

Unit/Group/Process Information	
ID No.: GRP-TANKS1	
Control Device ID No.: 310 B12	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-TANKS1	
Control Device ID No.: MS FLARE	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of a pilot flame shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: GRP-TANKS1	
Control Device ID No.: MO3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-TANKS2	
Control Device ID No.: 310 B12	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

Unit/Group/Process Information	
ID No.: GRP-TANKS2	
Control Device ID No.: MS FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of a pilot flame shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	



Unit/Group/Process Information	
ID No.: GRP-TANKS2	
Control Device ID No.: MO3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-TANKS3	
Control Device ID No.: 310 B12	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

Unit/Group/Process Information	
ID No.: GRP-TANKS3	
Control Device ID No.: MS FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of a pilot flame shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: GRP-TANKS3	
Control Device ID No.: MO3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: MO3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: MS FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R115-2
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of a pilot flame shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: 310 B12	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R115-3
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 09/10/2014.
2. The compliance history review evaluated the period from 07/16/2008 to 07/06/2013.  
Site rating: 0.0      Company rating: 0.31  
(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)
3. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No
2. Is a compliance plan and schedule included in the permit?.....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes  
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes  
OP-UA3 - Storage Tank/Vessel Attributes  
OP-UA4 - Loading/Unloading Operations Attributes  
OP-UA5 - Process Heater/Furnace Attributes  
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes  
OP-UA7 - Flare Attributes  
OP-UA8 - Coal Preparation Plant Attributes  
OP-UA9 - Nonmetallic Mineral Process Plant Attributes  
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes  
OP-UA11 - Stationary Turbine Attributes  
OP-UA12 - Fugitive Emission Unit Attributes  
OP-UA13 - Industrial Process Cooling Tower Attributes  
OP-UA14 - Water Separator Attributes  
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes  
OP-UA16 - Solvent Degreasing Machine Attributes  
OP-UA17 - Distillation Unit Attributes  
OP-UA18 - Surface Coating Operations Attributes  
OP-UA19 - Wastewater Unit Attributes  
OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes



OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes